Comments and Responses to
Tentative Order No. R9-2003-0155 and Draft NPDES Permit No. CA0109347
for the United States Marine Corps Base, Camp Pendleton Wastewater Treatment Plant Nos. 1, 2, 3, & 13,
Discharge to the Pacific Ocean via the Oceanside Ocean Outfall, San Diego County

The Regional Water Quality Control Board, San Diego Region (Regional Board) issued Tentative Order No. R9-2003-0155 and Draft NPDES Permit No. CA0109347 on July 11, 2003 for public comment. Written comments were received until close of business, August 6, 2003. This document contains staff's responses to comments received.

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Comments received from County of San Diego, Department of Environmental Health (DEH)	
With respect to section IV. Receiving Water Monitoring, Order No. R9-2003-0155, DEH has the following comments: 1. In section A. "Surf Zone Water Quality Monitoring", sampling frequency during the winter is "once every other week from November 1 through April 30 of each year." DEH recommends this frequency be changed to " a minimum frequency of once per week" due to year round recreational use of ocean waters in Oceanside. 2. The opening paragraph of this section states, "Monitoring must reflect conditions during all critical environmental periods." DEH has received and reviewed bacterial indicator data for over 3000 surf zone samples in San Diego County per year since 1999. Based upon this experience and knowledge of conditions that affect beach water quality DEH has developed S.O.P.s (Standard Operating Procedures) for	• The Southern California Coastal Water Research Project (SCCWRP) is in the process of developing a model receiving water monitoring program for medium-sized ocean discharges (such as the one from the Oceanside Ocean Outfall- OOO). This model will contain recommendations on how to develop more appropriate ocean receiving water monitoring programs that can be implemented consistently among discharges, will increase the efficiency with which monitoring is conducted, and improve the effectiveness with which the programs meet agencies' needs. (See also City of Oceanside's comments, below) • The model program should be completed before February 2005. Once this program is completed, staff intends to implement the recommended changes by revising the monitoring and reporting programs for all applicable discharges as their permits become due for renewal. • The receiving water and sediment monitoring programs in the subject tentative order are the same as those already

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surf zone sample collection that should provide representative samples for most critical environmental periods and be most protective of public health. Until new developments in science and bacterial indicator methodology become available to enhance our knowledge of temporal and spatial variability of indicators and their relationship with pathogens, DEH recommends using the "STANDARD OPERATING PROCEDURES FOR THE COLLECTION OF WATER SAMPLES FOR BACTERIAL ANALYSIS FROM AND OCEAN AND BAY RECEIVING WATERS" attached herein.	required for the City of Oceanside and the Fallbrook Public Utilities District (FPUD). This was done intentionally, so that the overall monitoring program for the OOO may be conducted jointly with the City of Oceanside, and any other dischargers utilizing the OOO. Currently, the City of Oceanside staff conducts the receiving water monitoring for all discharges to the OOO. • The City of Oceanside's Order No. 2000-11 and the FPUD's Order No. 2000-12 expire February 9, 2005. At that time, a revised receiving water monitoring program will be developed and incorporated into the renewal of those Orders. Whatever monitoring program is determined to be appropriate for the dischargers at that time will subsequently be incorporated into this order, via a permit amendment.
Comments received from City of Oceanside	
Under Section IV. Effluent Monitoring: 1. The City would like to see CBOD added to the monitoring on a weekly basis in order to compare data with our facility. Fallbrook Public Utility District and Oceanside use CBOD for determining compliance in place of BOD for discharges through the Oceanside Ocean Outfall. 2. The samples for settleable solids and for Oil and Grease should be changed from a 24-hour composite to a grab to be consistent with our permit and standard monitoring requirements.	• 40 CFR 133.102 (a) (4) states that, "*At the option of the NPDES permitting authority, in lieu of the parameter BOD5 and the levels of the effluent quality specified in paragraphs (a)(1), (a)(2) and (a)(3), the parameter CBOD5 may be substituted…*". Based on correspondences with Camp Pendleton staff, the Base has not been able to establish a linear correlation between BOD and CBOD. Since first regulated by the State in 1987, compliance with federal secondary treatment requirements at the Base facilities has been measured using BOD5. In order to detect significant changes in the secondary treatment efficiency at the Base facilities, we intend to continue to evaluate compliance using BOD5. However, staff concurs that, in order to evaluate the combined CBOD5 loading to the OOO, the Base also needs

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	to measure CBOD5. Therefore, Errata Sheet Item No. 16 modifies the monitoring program to include monthly sampling of effluent CBOD5. • Errata Sheet Item Nos. 15 & 16 modify the monitoring program to include grab samples of Oil & Grease and Settelable Solids, rather than 24-hour composites.
Under Section VI. Receiving Water Monitoring: 1. It is my understanding that County DEH has requested that the requirements for Camp Pendleton's permit be changed to weekly shore station monitoring throughout the year. This tentative order requires weekly samples from May 1 through October 31 and once every other week from November 1 through April 30 of each year. This is the same frequency as in the permits for Oceanside and Fallbrook. The City feels this is adequate to protect the beneficial use of the shoreline. There is no history of impacts to the surfzone from discharges through the Oceanside Ocean Outfall. It is my understanding that the County samples shore stations along the coastline weekly April 1 though October 31 and does not sample during the winter months. Sampling twice a month during the winter period of reduced beach usage provides adequate data for evaluating beach water quality. The City suggests re-evaluating the monitoring requirements when the permits for Oceanside, Fallbrook, Encina and San Elijo are up for renewal during the end of 2004/beginning of 2005 instead of changing the monitoring requirements	• As stated in the above response to DEH comments, the City of Oceanside's Order No. 2000-11 and the FPUD's Order No. 2000-12 expire February 9, 2005. At that time, a revised receiving water monitoring program will be developed and incorporated into the renewal of those Orders. Whatever monitoring program is determined to be appropriate for the dischargers at that time will subsequently be incorporated into this order, via a permit amendment.

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of Camp Pendleton at this time. SCCWRP is working on a regional ocean monitoring program that should be completed by that time. This should allow for a standard program.	
It is also the opinion of the City that the requirements under C. Offshore Water Quality Monitoring in Section VI. Receiving Water Monitoring program should not be changed at this time. The City is performing most of this work under a resource exchange with SCCWRP and participating in Bight 03 as part of this program. The scope of work has been determined, contracts have been awarded and the work has begun. This entire monitoring program will be updated as part of the regional ocean monitoring program developed by SCCWRP when the permits for Oceanside, Fallbrook, Encina and San Elijo are up for renewal during the end of 2004/beginning of 2005.	• As stated in the above response to DEH comments, the City of Oceanside's Order No. 2000-11 and the FPUD's Order No. 2000-12 expire February 9, 2005. At that time, a revised receiving water monitoring program will be developed and incorporated into the renewal of those Orders. Whatever monitoring program is determined to be appropriate for the dischargers at that time will subsequently be incorporated into this order, via a permit amendment.
Comments received from CA Department of Health Services (DHS)	
After careful review of the Report of Waste Discharge and the Tentative Order, DHS offers the following comments for the San Diego Regional Water Quality Control Board's consideration: **1. (ROWD, Section 3.5, page 17)**. A summary of bacteriological water quality from monitoring stations during the calendar year 2002 is provided. The nearshore stations, located approximately 800-1,000 feet offshore, are sampled monthly. Thus, only 12 samples	Note that the DHS is commenting on the Report of Waste Discharge (ROWD), which is a permit application submitted by the discharger. • The data set collected thus far has already been analyzed (to determine whether or not the effluent plume reaches the shoreline) as part of SCCWRP's "Bight 1998" study of all ocean outfall discharges in the Southern California Bight. The study is available at http://www.sccwrp.org/regional/98bight/98docs.htm and

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from each station are considered in the evaluation. Many years worth of monitoring data have been collected by the City of Oceanside. This substantial data set should be analyzed to evaluate whether or not the effluent plume occasionally reaches the shoreline. In order to better represent the entire range of environmental variability that exists in the coastal waters near the outfall, the time period and the number of samples evaluated should be maximized. A question that should be posed is whether elevated levels of bacteria in the offshore and nearshore stations occur at times when samples from the shore stations are low in coliform. Such a pattern could be evidence of the movement of the effluent plume into the nearshore from the outfall rather than from shore.	concludes, among other things, that 1. "the amount of marine microbiological monitoring conducted in southern California (by the POTWs) appears to exceed that in the rest of California or any other part of the country…"and that, 2. "While NPDES permittees accounted for more than 75% of monitoring efforts, all the NPDES monitoring was conducted by sewage dischargers, *even though most POTWs have consistently demonstrated that their outfalls are sufficiently offshore to avoid beach exposure*." • Specific to the OOO, in 1998, a separate analysis was conducted by a sub-committee of the Agua Hedionda Lagoon Shellfish Technical Advisory Committee (AHLSTAC). This analysis also concluded that, based on the receiving water monitoring conducted around the Oceanside and Encina Ocean Outfalls, the effluent coliform loading from each of the outfalls was unlikely to have an effect on the shellfish growing area. • The data collected thus far is also currently under review by SCCWRP, as part of their model monitoring program for medium-sized outfall discharges (mentioned above). Based on the analysis of this, and similar outfall receiving water monitoring programs, SCCWRP will develop recommendations regarding the appropriate time period and number of samples for more accurately characterizing the nature of each effluent outfall plume, under all conditions present. Again, staff intends to implement any applicable changes to the OOO monitoring program in February 2005.

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2. **(ROWD, Section 3.6, page 19)**. The statement "To date the Regional Board has not designated any shellfish harvesting areas in the vicinity of the ocean outfall" is misleading. A commercial shellfish harvesting operation area has existed in an adjacent area (Agua Hedionda Lagoon) since at least 1985. Agua Hedionda Lagoon is located about 3 miles from the OOO. It would seem reasonable that areas of the adjacent shoreline be included in the area "in the vicinity of the ocean outfall." In addition, DHS has noted an increased interest in the potential use of nearshore coastal waters for commercial shellfish aquaculture. It will be ever more important to recognize this beneficial use and to conduct the necessary monitoring to accurately determine the areas outside of the influence of the wastewater treatment plant (WWTP) discharges. Thus, the Regional Board should stipulate that the receiving water be protected for the existing and future beneficial uses of shellfish growing and harvesting.	• This statement was made in the discharger's ROWD, and was not used by staff in preparing the TO or Fact Sheet. • Errata Sheet Item No. 5 modifies the findings (#23) to make reference to the location of the nearest shellfish harvesting area from the outfall. • Staff will continue to evaluate all data received regarding the OOO to determine if the discharge is having an adverse impact on the shellfish harvesting beneficial use.
3. **(ROWD, Section 4.5.4, page 40)**. The statement "The addition of the MCB Camp Pendleton STP effluent to the City of Oceanside Ocean Outfall is not projected to alter receiving water bacteriological quality…" should be supported by a quantitative analysis. As the mass loading of wastewater pollutants from a point source increases, the area of impact may be expected to increase. From a public health perspective, it is not sufficient to merely show that the typical conditions	• Again, this statement was made in the discharger's ROWD, and was not used by staff in preparing the TO or Fact Sheet. • It should be noted, however, that staff concur with the Base's finding that the addition of the proposed 3.6 MGD to the OOO is not projected to alter the receiving water bacteriological quality for the following reasons: 1. Quantitative analyses conducted thus far (by SCCWRP and AHLSTAC) indicate that the existing discharge is

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present at the outfall negate the possibility of a water quality impact to shellfish growing areas. Instead, an attempt to quantify the frequency and magnitude of the water quality impacts under the most adverse environmental conditions that occur should be made. Specifically, it is acknowledged in the ROWD that during periods when the thermocline disappears, the effluent plume may reach the ocean surface. Thus, during periods when the thermocline is absent, coinciding with the occurrence of strong winds, the possibility increases for the effluent plume to extend a greater distance from the outfall. Even in times when the thermocline is present, upwelling or downwelling can result in onshore movement of offshore waters at depth or on the surface, respectively. DHS is particularly concerned about the affect on the existing shellfish harvesting area in Agua Hedionda Lagoon, and the discharger should evaluate the potential impact of the discharge on the shellfish harvest operation. In addition, the discharger should attempt to quantify the affect of 3.6 MGD of additional discharge to the OOO. The additional proposed discharge is cumulative with the 16.3 MGD currently discharged (maximum daily flow for existing WDRs 2000-11 and 2000-12), and the added discharge may increase the risk of the plume reaching the shellfish growing area. Although the chemical contaminants may meet the TO limits at the zone of initial dilution, bacterial pathogens, for which there are no established limits in the TO, may require	not having any adverse impacts to the receiving waters. 2. Finding No. 10 of the TO discusses the outfall modeling analysis conducted by the SWRCB. The SWRCB analysis concludes that "the difference in dilution was less than the resolution of the model, and therefore considered the increase in flow to be incidental and not of consequence". • Furthermore, the California Ocean Plan establishes bacteriological receiving water limitations to protect all areas where shellfish may be harvested for human consumption. These limitations are incorporated into the TO in Section C.1.b. • To date the OOO receiving water monitoring program has not exceeded these limitations at any of the offshore or nearshore monitoring stations, where negative effects, if present, would first be detected. If the additional flow triggers exceedances in the receiving water limitations mentioned above, the Regional Board can require remedial actions, in accordance with Section C.1.c of the TO. • Although the receiving waters of the OOO are not considered to be impacted, the shellfish growing area in Agua Hedionda Lagoon is listed as an impaired water body on the SWRCB's 303(d) list. It is likely that sources other than the OOO discharge are contributing to this impairment. Additional attempts to determine the magnitude and source of contamination to the shellfish growing area will be

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miles of dilution via dispersion and die-off before shellfish growing water standards are met.	addressed when the Regional Board conducts a Total Maximum Daily Load (TMDL) analysis for bacterial indicators in Agua Hedionda Lagoon.
4. (TO, Section B. Item 7, page 17). This section states (1) that the location of a waste discharge must be based on a "detailed assessment of the oceanographic characteristics and current patterns to assure that pathogenic organisms and viruses are not present in areas where shellfish are harvested…."; and (2) paraphrasing the remainder of the section, that if waste contains pathogenic organisms it must either be discharged a sufficient distance from a shellfish area or disinfected prior to discharge. These data are not provided in either the ROWD or TO. DHS recommends that the oceanographic data be presented that demonstrates sufficient reduction in pathogens such that the existing growing area not be impacted by the increased discharge volume.	• To the extent of the resources available, the Regional Board believes that a sufficient assessment has been conducted, and that based on all the information collected thus far, the location of the waste discharge is a sufficient distance from any shellfishing and water-contact sports areas. Data considered in this evaluation includes: 1. SCCWRP's Bight 98 study 2. All receiving water monitoring data 3. AHLSTAC's review of the receiving water monitoring data 4. SWRCB's outfall modeling results • Although too lengthy to provide in the TO or ROWD, this and other data are available for review. • Furthermore, if the DHS provides information demonstrating that sufficient pathogen reduction does not occur, than the discharger can be required to disinfect in accordance with Discharge Specification B.7 of the TO.
5. **(TO, Section C. Item 1, page 18)**. This section states that in all areas where shellfish may be harvested for human consumption, bacterial standards with respect to total coliform must be met "throughout the water column". Currently, none of the receiving water stations in either the shore or near-shore stations is closer than about two miles from Agua Hedionda Lagoon. The Monitoring and Reporting Program	• Again, any and all changes to the OOO receiving water monitoring program will be considered after reviewing recommendations from SCCWRP's model monitoring program. Agencies are encouraged to comment on this document, when the opportunity arises. • Currently the existing monitoring stations (throughout the water column) are not located near the mouth of Agua Hedionda Lagoon because these stations were selected based

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(page 67-68) attached to the TO designates one additional shore and two additional near-shore stations to be determined at a later date. DHS recommends that the monitoring program be modified to include a shore and a nearshore station located near the mouth of Agua Hedionda Lagoon to help evaluate the potential affect of the OOO discharge on the shellfish growing area over time.	on their likelihood to detect impacts from the OOO. If no impacts are detected at the stations closer to the outfall (as has been the case, based on data collected thus far), than it is likely that no impacts from the OOO would be detected at a greater distance from the discharge (i.e. near the mouth of Agua Hedionda Lagoon). And, if impacts were detected at stations near the mouth, and not at the stations closer to the OOO, staff would be inclined to suspect that the source of these impacts would be something other than the outfall discharge.
Modeling Bacterial Concentrations in the Receiving Water In order for DHS to classify a shellfish growing area for the harvest of shellfish for human consumption, it must determine an area around each sewage outfall that is closed to shellfish harvesting. The size of the closure zone must be based on many parameters, such as the volume of the discharge, the effluent bacteriological quality of the discharge, the bacterial die-off rate, and the time of waste transport to the shellfish growing area. A quantitative analysis by the proponent of the affect of an increased discharge to the OOO on the nearby shellfish growing area was not provided in the ROWD, therefore, DHS has performed a preliminary evaluation of the potential impact of the existing and proposed discharge with the computer model PLUMES developed by EPA. The modeling assumed a discharge FC concentration for the combined discharge of 510,000 FC/100 mL. This value represents the highest MPN of 11 effluent grab samples collected by	• The evaluation performed by the DHS does not appear to take into account the following considerations: 1. More accurate fecal coliform (FC) concentrations were provided to DHS for analysis. The FPUD discharges disinfected reclaimed water (i.e. with FC concentrations averaging <2 MPN). The Base facilities will also discharge a combination of disinfected reclaimed water and secondary effluent. The effluent FC concentrations from each plant provided by the Base for analysis were also below the value assumed by the DHS for the cumulative discharge. 2. The DHS model considered a maximum permitted (cumulative) flow of 27.7 MGD. Finding No. 8 of the TO demonstrates that the maximum permitted flow from all the dischargers at any time will be no greater than 27.16 MGD. • It is for these reasons that the Regional Board believes that

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the City of Oceanside from the Cities' WWTPs during October, November, and December 2001. However, because of the lack of routine effluent monitoring for coliform, it is not known if this concentration represents worst-case conditions. The use of this value by DHS was used to generate conservative model results protective of public health in light of the lack of ongoing monitoring of bacterial concentrations in the OOO discharge. Such monitoring would allow for characterization of the normal range of FC concentrations in the discharge. DHS attempted to model the conditions that exist when there is no thermocline (i.e., late winter conditions) allowing ocean surface currents of varying speed and direction to move the plume in a given direction. The results of preliminary model runs indicate that the shellfish bacterial standard could be exceeded under certain conditions that may exist as a result of the proposed permit action. The modeling predicts that ocean surface currents at the higher end of the range reported in the ROWD (0.80 feet/ second) coincident with a maximum permitted flow of 27.7 mgd and a surface current direction at a 20 degree angle to the diffuser, could result in an exceedance of the shellfish criterion applied to the *Restricted* growing area classification of Agua Hedionda Lagoon (88 FC/100 mL MPN) for a distance of approximately 16,000 feet from the diffuser. The mouth of Agua Hedionda Lagoon is approximately 15,800 feet from the OOO. Therefore, under these conditions the lack of discharge limits for FC could result in an increase in the radius of the shellfish	the model's outcome does not reflect realistic "worse-case" conditions. • The Regional Board does concur that additional information (e.g. currents, wind, thermocline, etc.) would be useful to more accurately determine the extent of the impacts from the outfall discharge. Staff also believes, however, that the responsibility for obtaining such information should be shared by all the agencies discharging to the outfall. Therefore, the Regional Board will consider requiring this information to be obtained by all the applicable dischargers in February 2005, when staff intends to make modifications to the monitoring program.

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harvest closure zone applied around the OOO that would include the mouth of Agua Hedionda Lagoon. The findings of an analysis of the effect from an increase in pathogen loading resulting form the proposed additional discharge are relevant not only to the currently active shellfish harvesting area in Agua Hedionda Lagoon, but to future shellfish growing areas in the coastal waters near the outfall. Within the past few years, prospective shellfish growers have approached DHS about the feasibility of locating shellfish areas in the nearshore waters of southern California. With each such inquiry DHS must determine a safety closure zone around each outfall to assure that harvested shellfish are not adversely affected by the discharge under normal operating conditions of the wastewater treatment plant. It has been difficult for DHS to determine the distance from sewage outfall diffusers along the San Diego coast due to the lack of adequate data on the quality of the effluent, as well as data quantifying ocean current speed, direction, and duration, which are integral to evaluating transport of the effluent plume. The preliminary model results of the proposed added discharge from CP indicate the need for a larger closure zone around the OOO. DHS recommends that either the SDRWQCB or the Oceanside WWTP conduct a more thorough analysis of the effect of increasing the discharge volume to receiving waters with respect to FC concentrations and the NSSP water quality standards. Such an analysis by SDRWQCB or the discharger could be used	

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to determine the appropriate TC/FC limits with or without disinfection. DHS would be quite willing to provide information and assistance for this effort. To increase the accuracy of the modeling, it would be desirable to collect ongoing data to (1) characterize FC concentration of the discharge over time; and (2) characterize ocean current speed and direction in the area around the diffuser especially in the direction of the mouth of Agua Hedionda Lagoon. Effective monitoring of the discharge would include offshore and nearshore sample collection during windy conditions when ocean surface temperatures are low (no thermocline conditions). DHS would like to see the discharger determine the maximum distances, both longshore and cross-shore, that the modified effluent plume resulting from the proposed discharge may affect indicator organism concentrations relative to existing or proposed shellfish areas. To estimate FC transport distances that are conservative and thus protective of consumers of shellfish, the use of modeling supported by appropriate monitoring of ocean currents and effluent FC concentrations should be used. The monitoring should be designed to encompass the extremes of environmental and effluent variability that would result in longer transport distances, in particular to determine effluent limitations needed to prevent elevated FC at the mouth of Agua Hedionda Lagoon.	

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Comments received from USMC Camp Pendleton	
FACT SHEET	
p. 2, first paragraph, Facility Description- should be Plant 11 vice Plant 10	• Errata Sheet Item No. 17 modifies the Fact Sheet accordingly.
p. 3, All Plants- **Non-Hazardous** sludge goes to the 43 Area landfill	• This is specified in page 10, Section M. (Biosolids) of the Fact Sheet, which reads, "Dewatered sludge from all four treatment plants is tested for all parameters required under 40 CFR Part 503. Uncontaminated sludge is hauled to Camp Pendleton Area 43 where it is disposed of in an on-site Class III landfill. Contaminated sludge is hauled off-base through a hazardous waste contract to an appropriate disposal facility."
p. 3, paragraph 2- Add solids contact	• Errata Sheet Item Nos. 1 & 18 modify the TO and Fact Sheet accordingly.
p. 3, paragraph 3- Add solids contact	• Errata Sheet Item Nos. 2 & 18 modify the TO and Fact Sheet accordingly.
p. 3, paragraph 5- Add flow equalization basin, polymer feed, metal salts (coagulation)	• Errata Sheet Item Nos. 3 & 18 modify the TO and Fact Sheet accordingly.
p. 3, paragraph 6- Add flow equalization basin, polymer feed, metal salts (coagulation)	• Errata Sheet Item Nos. 4 & 18 modify the TO and Fact Sheet accordingly.
p. 4, Description of discharge- There is no Figure 2-1 attached with the order.	• Figure 2-1 should be attached as the last page of the Fact Sheet. It should not be attached to the Order.
p. 8, paragraph F.1- Base does not concur with staffing levels provided in the Fact Sheet. These are guidelines.	• A current recommendation on how compliance should be determined was provided in the Fact Sheet. This number

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Using actual daily flow rather than design capacity, STPs 1 and 2 are 0.5 MGD or less, so manning for those plants should be 2.5 full-time employees (FTEs) or less per plant. The fact sheet suggests 9.1 FTEs at STP 1 and 6.8 FTEs at STP 2, compared with 5.4 FTEs at STP 13, which treats an average flow of 1.4 MGD. The EPA recommended staffing for a 1 MGD plant is 5 FTEs. Two of the four SMR plants treat average flows of less than 40% of that size, while the other (Plant 3) averages about 0.6 MGD.	was calculated using design capacity (rather than actual daily flows) because that is the parameter specified in EPA's guidance document.
p. 9, paragraph F.3- Oceanside's and FPUD's permits do not expire in 2003.	• Errata Sheet Item No. 19 modifies the Fact Sheet to show the actual expiration date (2005).
p. 10, paragraph. L- What are the influent monitoring parameters the Board will be looking for to decide whether to implement a Source Control Program? Oil and grease?	• The TO already contains requirements for the Base to implement a source control program. • The Board will consider the results of the annual industrial waste surveys (as required per Section D.2) to determine whether there is a need to implement additional numerical limitations in accordance with Federal Regulations. • Weekly influent oil & grease sample results shall be used to evaluate compliance with Section D.5 of the TO.
TENTATIVE ORDER	
p. 17, paragraph following Item 7c -The language "Disinfection procedures that do not increase effluent toxicity and that constitute the least environmental and human hazard shall be used" might be construed as ruling out using chlorine for disinfection and requiring something	• The Regional Board cannot specify the type of treatment process necessary; they can only establish the requirements that need to be met in order to protect the receiving waters. In this case, if the Base can demonstrate that chlorinating can be done without resulting in effluent violations or whole

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other, such as ultraviolet and ozone. Please clarify.	effluent toxicity exceedances, then the Base is free to use such a method.
p. 20, Item 6 - Please clarify how CPEN can assure that water quality objectives will be met by the discharge through the OOO when it is not the only discharger.	• If there is a violation of the receiving water limitations, staff will attempt to determine the source of the violation by evaluating the effluent results from each of the individual discharges (for the constituent in violation). Unless it is clear that one particular discharge is solely responsible for a receiving water violation, the receiving water violation shall remain the responsibility of all those discharging to the outfall.
p. 25, Item D (3) - Suggest changing the last sentence to read "At least once before the expiration date of this Order, the domestic source control program shall be reviewed and, if necessary, updated."	• Errata Sheet Item No. 9 modifies the TO accordingly.
p. 25, Item E (1) -Insert "40" before the cite to CFR in line 1 and in line 4.	• Errata Sheet Item No. 11 modifies the TO accordingly.
p. 25, Item 5a -Please clarify what analyte must be no greater than 25 mg/l. Being that there is an influent monitoring requirement for each STP for oil and grease, does this 25 mg/l refer to that monitoring requirement? If influent oil and grease does not exceed 25 mg/l, will that satisfy the requirement under 5a?	• Yes, compliance will be evaluated using the influent oil & grease concentrations of weekly samples, as required to be monitored at each plant. • Errata Sheet Item No. 10 modifies the TO make this more clear.
p. 25, Item 5b -CPEN feels the weekly visual inspection requirement is excessive if required to be performed by the Facilities Maintenance Department (FMD). Presently the	• The TO states that "The inspection may be performed by facility personnel or other responsible agency". This could include a contractor and/or the units utilizing the wash racks;

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units utilizing the washracks are to perform a weekly inspection, and in the case of some of the closed-loop washracks, a contractor does this inspection. Also, if units deploy and the washracks are not in use, can weekly inspections be waived for that time period?	as long as it is clear (to both Base and Regional Board staff) from the signed, written log, who is responsible for the inspection at any given time. • If the oil/water separators (OWS) are in use, they must be inspected weekly. In the event that the units are deployed and the OWS are not in use, it could be argued that the OWS are not "serving active facilities".
p. 26, Item 2 -Do CPEN's landfills fit the description of a municipal landfill?	• Yes. Errata Sheet Item Nos. 12 & 20 modify the TO and Fact Sheet to reference the most current regulations governing landfills (Title 27). .
p. 28, Item 7 -Who will define proper maintenance, laboratory controls, quality assurance, and backup or auxiliary facilities? Subjective language.	• This will be evaluated by the Regional Board during compliance inspections and if any permit limitations are violated.
p. 28, Item 8 - Supervisor and operator staffing should not be dictated here. Base does not concur with staffing levels provided in the Fact Sheet. These are guidelines. Using actual daily flow rather than design capacity, STPs 1 and 2 are 0.5 MGD or less, so manning for those plants should be 2.5 FTEs or less per plant. The fact sheet suggests 9.1 FTEs at STP 1 and 6.8 FTEs at STP 2, compared with 5.4 FTEs at STP 13, which treats an average flow of 1.4 MGD. The EPA recommended staffing for a 1 MGD plant is 5 FTEs. Two of the four SMR plants treat average flows of less than 40% of that size, while the other (Plant 3) averages about 0.6 MGD.	• A current recommendation on how compliance should be determined was provided in the Fact Sheet. This number was calculated using each plant's design capacity (rather than actual daily flows) because that is the parameter specified in EPA's guidance document. • Staff has consulted with the State Board for evaluation of compliance with this provision. State Board staff confirmed that the numbers referenced in the Fact Sheet are appropriate and stress that those numbers should be considered a staffing *minimum*. • This minimum staffing requirement does allow for temporary staffing adjustments/ re-assignments to accommodate placing staff where they are needed most. In

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CPEN presently has 24 operators, 5 lab personnel, and 10 laborers, plus the personnel work about 125 hours of overtime weekly, resulting in another 3 FTEs, for a total of 42 FTEs. The issue for CPEN is not so much the staffing levels in total, but the need for flexibility in assigning staff where most needed. For instance, requiring 9.1 FTEs at STP 1, which has not experienced any problems meeting discharge standards other than chlorine residual, is excessive. If CPEN is allowed to assign staff on that basis rather than strictly adhering to the EPA staffing guidelines on a plant by plant basis, this should not be an issue. Also, could this requirement mean that CPEN will be immediately out of compliance with the new permit? Suggest a schedule to becoming compliant with this requirement.	addition to the STPs, this could include assigning staff to the collection and conveyance systems, as well. • The Regional Board, State Board, and USPEA have all documented staffing deficiencies for several years now. Regional Board staff will continue to consult SWRCB staff as to whether the staffing requirements are being met. If the Base does not have the required number of staff on the effective date of the TO (i.e. 10 days after adoption), it will be considered non-compliant with this provision.
p. 29, Item 10 -Unsure of the intent of this paragraph. The MMR is used to report data. Will it be required that detection limits and quantitation limits be reported in each MMR?	• Yes. The detection and quantitation limits shall be required to be provided any time analytical data is reported pursuant to the Monitoring and Reporting Program (i.e. with each monthly monitoring report).
p. 29, Item F(12) -Should be "dischargers" vice "dishargers"	• Errata Sheet Item No. 13 modifies the TO accordingly.
p. 35, Item 6 -The new permit requires that if receiving water samples exceed bacterial water quality objectives the discharger shall immediately notify the San Diego County Department of Health Services (should that read Department of Environmental Health?) and post signs.	• Errata Sheet Item No. 14 modifies the TO to read DEH. • If receiving water samples are exceeded, and the DEH is not notified or signs are not posted accordingly, all dischargers (with this permit requirement) can be held responsible. However, redundant notifications or postings from each

Comment	Staff Response
What if any will CPEN's role be in regards to this requirement? As we will be utilizing Oceanside's monitoring data, and they will be the first to find out if there are any exceedences, will all dischargers to the OOO be required to notify DHS (or DEH)?	agency are not required. • Due to the fact that they are the first to obtain the data and the closest to post signs, it seems logical that the City of Oceanside would be the most suitable agency to notify the DEH and post signs. However, it is up to the dischargers to agree amongst themselves on who will notify the DEH, and how it will be determined (and conveyed to the other agencies) that this has been done.